REMARKS

In response to the Office Action mailed October 15, 2008, the Applicant submits this Reply. In view of the foregoing amendments and following remarks, reconsideration is requested.

Claims 1-5 remain in this application, of which claim 1 is independent.

Interview Summaries

Applicant thanks the Examiner for the telephone interviews which took place between the Examiner and Oliver Strimpel, Applicant's representative, on October 30, 2009, and on November 2, 2009. In the first interview, the distinction between "transformation data" and image data was discussed. U.S. Patent Publication No. 2003/0085932 to Samra (Samra) was discussed, and it was pointed out that Samra's Figure 2 shows the outputting of image data from effects in a compositing tree. In the second interview, possible claim amendments were discussed.

Rejections Under 35 U.S.C. §103

Claim 1 was rejected under 35 U.S.C. §103 as being unpatentable over Samra in view of U.S. Patent 6,377,712 to Georgiev et al. (Georgiev). The claim recites, in part:

> ... geometrical transformation operators employing mathematical matrices, wherein a transformation operator provides transformation data as an output, wherein the output transformation data does not include image data;
>
> ... wherein at least one effect operator in the effect tree has one or more inputs for receiving transformation data and has a local transformation specification that is combined with the received transformation data; and
>
> means for enabling a user to connect an output of a transformation operator to an input of an effect operator for receiving the transformation data...

In other words, the claim requires transformation operators that provide transformation data as output. We believe the Examiner has misread the term "transformation data" to mean "transformed image data." But they are not the same. Transformation data includes the mathematical transformations themselves, and not a media object, such as an image, to which the transformation has been applied. Transformation data is described in the instant specification,

for example in Figure 2, which illustrates that the output of a transform does not include media data. For example, still referring to Figure 2, the output of Transform 5 is transformation data that is received as input by Transform 1 and Transform 2. As indicated in the specification, such "transform operators that output only transformations may use user-specified parameters to output transformations, or may operate on transformation data input from another transform operator." [page 3, paragraph 1, emphasis added]

The examiner points to Figure 2 of Samra and the description of this Figure in paragraphs [0019] and [0020] as indicating the output of transformation data. But in Figure 2, and throughout the reference, Samra is manipulating images. In Figure 2A, for example, Samra starts with a combination of foreground images (FG1, FG6, FG7, FG8) and background images (BG1, BG2) and combines them in his effect nodes (E1, E6, E8) to produce composited images. In other words, Samra passes image data from one effect to another. Nowhere in Figure 2, or anywhere else in Samra, is there any teaching or suggestion of transformation data as output, or transformation data as input to a transformation operator, as required by claim 1.

In order to still further distinguish claim 1 from Samra, claim 1 also requires that "output transformation does not include image data." As discussed above, the outputs from the effects disclosed in Samra's compositing trees all include image data.

The examiner relies on Georgiev for his teaching of transformation operators that employ mathematical matrices. But Georgiev does not teach or suggest transformation data as output from a transform nor operating on transformation data input from another transform operator, as required by Claim 1.

In view of the above, Applicant believes claim 2 and its dependents, claims 2-5, are patentable over the cited references.

CONCLUSION

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this reply, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

Please charge **Deposit Account No. 500876** in the amount of **$940.00** ($810.00 RCE fee and $130.00 extension fee). The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment to said Deposit Account.

Filed via EFS-WEB
on Thursday, November 12, 2009

Respectfully submitted,

/Oliver Strimpel/

Oliver Strimpel, Registration No. 56,451
Attorney for Applicant
Avid Technology, Inc.
One Park West
Tewksbury, MA 01876
Phone: 978-640-6789